

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KELSEA HOLTON and LUIS MIRANDA,
on behalf of all others similarly situated,

Plaintiff,

C.A. No.: 25-cv-00298-JLH

v.

IGLOO PRODUCTS CORP., a Delaware
corporation.

Defendant.

KRISTEN RIFFLE, individually and on
behalf of all others similarly situated,

Plaintiff,

C.A. No.: 25-cv-00495-JLH

v.

IGLOO PRODUCTS CORP.,

Defendant.

STIPULATION AND ~~PROPOSED ORDER~~ CONSOLIDATING CASES

Plaintiffs Kelsea Holton, Luis Miranda, and Kristen Riffle (“Plaintiffs”) and Defendant Igloo Products Corp. (“Defendant”) (collectively, the “Parties”), by their undersigned counsel, respectfully stipulate as follows:

WHEREAS, both of the above-captioned cases (*Holton et al. v. Igloo Products Corp.*, C.A. No. 25-cv-00298-JLH and *Riffle v. Igloo Products Corp.*, C.A. No. 25-cv-00495-JLH, collectively, the “Related Actions”) arise out of a product recall involving certain Igloo-brand coolers.

WHEREAS, the Related Actions are related, involve similar claims and legal theories regarding that same product recall, and are brought by overlapping putative classes;

WHEREAS, consolidation of the Related Actions is warranted under Fed. R. Ci. P. 42(a) on account of their involving common questions of law or fact, and centralization of this matter will serve as an efficient use of this Court's judicial resources;

WHEREAS, the Parties have agreed that, should consolidation be granted, Plaintiffs shall file a consolidated complaint within 21 days of the ruling;

WHEREAS, the Parties have agreed that, should consolidation be granted, Defendant shall have 30 days from the filing of a consolidated complaint to file a response, whether by filing an Answer or a responsive motion;

WHEREAS, the Parties have agreed that, should consolidation be denied, Defendant shall have 30 days from the date of the ruling to file a response, whether by filing an Answer or a responsive motion, to each of the *Holton* and *Riffle* matters.

THEREFORE, IT IS HEREBY STIPULATED, subject to the approval of the Court, as follows:

1. The Related Actions are consolidated before this Court for all purposes, including pre-trial proceedings and trial, under C.A. No. 25-cv-298-JLH (CONSOLIDATED) (the "Consolidated Action").which shall bear the following caption:

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE IGLOO PRODUCTS COOLER RECALL LITIGATION

C.A. No. 25-cv-298-JLH
CONSOLIDATED

2. Plaintiffs shall file a consolidated complaint within 21 days. Defendant shall have 30 days to file an Answer or responsive motion within 30 days of the Court's ruling, in the case of

a denial of the Stipulation, or 30 days after Plaintiffs file a consolidated complaint if the Court grants the Stipulation;

3. Subject to Court approval, all related cases that are subsequently filed in, or transferred to, this District shall be consolidated into this Consolidated Action for all purposes;

4. If a case which properly belongs as part of this Consolidated Action is hereafter filed in this Court or transferred here from another court, counsel for Defendant or counsel for Plaintiffs shall promptly call to the attention of the Clerk of the Court the filing or transfer of any such case, and counsel for Plaintiffs shall assure that counsel in subsequent actions receive notice of this Order. Upon receiving notice of this Order, counsel for the new action shall have ten (10) days to file papers as to why the new action should not be consolidated. Any party may thereafter file papers with respect to such filing within fourteen (14) days thereafter.

5. All papers and documents previously filed and/or served in any of the cases consolidated herein shall be deemed a part of the record in this Consolidated Action.

IT IS SO STIPULATED.

Dated: May 13, 2025

COOCH AND TAYLOR, P.A.

/s/ R. Grant Dick IV

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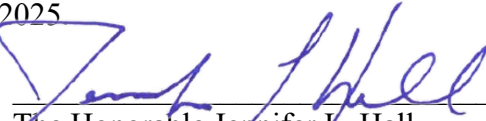
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SO ORDERED this 16th day of May, 2025


The Honorable Jennifer L. Hall
United States District Judge